

Docket # 2004N-0264

PET FOOD INSTITUTE

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November 9, 2004

VIA EXPRESS MAIL

Sergio Tulusso,
Feed Program Coordinator
Animal Health & Production Division
Canadian Food Inspection Agency
59 Camelot Drive
Nepean, Ontario, Canada
K1A 0Y9

Dear Mr. Tulusso:

Thank you for providing the pre-proposal notification regarding the upcoming publication of enhancements to the Canadian feed ban to reduce the risk of potential contamination with BSE infective materials. Pet Food Institute (PFI) appreciates the opportunity to formally submit these comments to the record, with further comments to come once the proposal is published in the *Official Gazette* later this year. These comments are the same as those shared with you during the recent Pet Food Association of Canada meeting in Toronto.

The pre-proposal indicates that non-ambulatory cattle and cattle deadstock could be eliminated indiscriminately from feed and fertilizer. PFI believes that that is a major economic and environmental issue that has no basis in science. These materials have a long history of safe use in animal feeds, and with the removal of certain potentially infective materials, should continue to be allowed to be used in animal feeds and fertilizers.

Therefore, Pet Food Institute recommends that Specified Risk Materials (SRMs) be defined as follows, and be removed from all animal feed:

- 1) From all cattle presented for inspection of any age, tonsils and distal ileum.
- 2) From all cattle presented for inspection 30 months of age or over - brain, skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, the transverse process of the thoracic and lumbar vertebrae, and the wings of the sacrum), and dorsal root ganglia.
- 3) From all cattle, of any age, not presented for inspection or those not allowed for human consumption, but intended for use in animal feed - brain, skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, the transverse process of the

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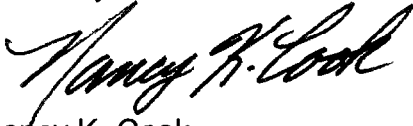
thoracic and lumbar vertebrae, and the wings of the sacrum), dorsal root ganglia, tonsils and distal ileum of the small intestine.

To ensure effective removal of the distal ileum, the USDA-FSIS SRM rule requires establishments to remove the entire small intestine.

Removal of these materials from animal feed could also be applied to fertilizer uses if deemed appropriate by CFIA.

Thank you for the opportunity to comment. We look forward to working with you on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy K. Cook". The signature is fluid and cursive, with the first name "Nancy" being more prominent.

Nancy K. Cook
Vice President, Technical & Regulatory Affairs

cc: ✓ Food and Drug Administration
Dockets Administration